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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

Plaintiff,

VS.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

**PLAINTIFF WAYMO'S
SUPPLEMENTAL SUBMISSION IN
CONNECTION WITH ITS RESPONSE
TO SECOND ORDER RE SCHEDULING
OF DEPOSITIONS (DKT. 679)**

Defendants.

1 Below, Waymo respectfully provides dates of availability for each of the Waymo witnesses
2 that Defendants included in their list of top ten list of deponents. (Dkt., 698.) Waymo could not
3 provide availability for all of these witnesses in its Response to Second Order re Scheduling of
4 Depositions because, as Waymo explained in its Response, Defendants failed and refused to provide
5 their list of top ten deponents to Waymo in advance of their filing at 4:45 PM. (Dkt. 699.)

	Name	Proposed Deposition Date
7	Drew Ulrich	July 13
8	Zachary Morris	July 14
9	Larry Page ¹	July 17
10	William McCann	July 28
11	John Krafcik	August 2
12	Pierre-Yves Droz	August 4
13	Sam Lenius	[no known conflict dates as of this 14 filing]

15 Waymo respectfully requests that the Court take under consideration the available dates above and
16 existing scheduling conflicts of its witnesses before assigning deposition dates.

17 DATED: June 22, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
18 LLP

19 By /s/ Charles K. Verhoeven

20 Charles K. Verhoeven
Attorneys for WAYMO LLC

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25 ¹ Defendants previously sought Mr. Pages's deposition during the PI Phase expedited discovery, and
26 Magistrate Judge Corley granted Waymo's protective order motion under the apex doctrine. (Dkt.
27 276.) Waymo provides a proposed deposition date for Mr. Page here but intends to promptly seek a
28 protective order now that Defendants have renewed their request for this apex deposition. Waymo
will work with the Special Master and Defendants to try to resolve this issue but, if necessary, will
seek relief from Magistrate Judge Corley through her established procedures.